

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

JOHANNA I. PASTRANA FIGUEROA

CASE NO. 15-06378 (ESL)

DEBTORS

Chapter 13

BANCO POPULAR DE PUERTO RICO

MOVANT

INDEX

VS.

**JOHANNA I. PASTRANA FIGUEROA,
JOSE RAMON CARRION MORALES,
CHAPTER 13 TRUSTEE**

☒ of acts against property under
§362(d)(1) "CAUSE"

RESPONDENTS

MOTION REQUESTING ENTRY OF ORDER GRANTING RELIEF FROM STAY

TO THE HONORABLE COURT:

COMES NOW Movant **BANCO POPULAR DE PUERTO RICO ("Banco Popular")**, through its undersigned counsel, and very respectfully alleges, states and prays:

1. On November 12, 2015 (Docket No. 19), Banco Popular filed a motion for relief from stay regarding Debtor's real property located at 787 RD. KM 3.4 Bayamon Ward, in Cidra, Puerto Rico, for lack of post-petition payments regarding loan #7753.
2. On December 9, 2015 (Docket No. 33), the stay was lifted for Loan modification purposes.
3. Banco Popular's records show that as of today, Debtor has not established contact

with the Loss Mitigation Program and arrears regarding loan #7753 total \$6,967.70.

WHEREFORE, it is respectfully requested that this Honorable Court enter an order granting Banco Popular relief from stay.

NOTICE

WITHIN FOURTEEN (14) DAYS FROM SERVICE OF THIS MOTION, ANY PARTY OBJECTING TO THE RELIEF SOUGHT HEREIN, SHALL SERVE AND FILE AN OBJECTION OR OTHER APPROPRIATE RESPONSE TO THIS MOTION WITH THE CLERK'S OFFICE OF THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO. IF NO OBJECTION OR OTHER RESPONSE IS FILED WITHIN THE TIME ALLOWED HEREIN, THE MOTION WILL BE DEEMED UNOPPOSED AND MAY BE GRANTED UNLESS: (1) THE REQUESTED RELIEF IS FORBIDDEN BY LAW; (2) THE REQUEST RELIEF IS AGAINST PUBLIC POLICY; OR (3) IN THE OPINION OF THE COURT, THE INTEREST OF JUSTICE REQUIRES OTHERWISE.

WE HEREBY CERTIFY that a true and correct copy of the foregoing has been filed electronically on this day with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the parties who have made an electronic appearance herein.

San Juan, Puerto Rico, this 18th day of March, 2016.

s/SERGIO A. RAMIREZ DE ARELLANO
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STATEMENT OF ACCOUNT

DEBTOR:		JOHANNA I PASTRANA FIGUEROA		BPPR NUM:		7753	
BANKRUPTCY NUM:		15-06378		FILING DATE:		08/20/15	
SECURED LIEN ON REAL PROPERTY							
Principal Balance as of		06/01/15				148,627.41	
Accrued Interest from		05/01/15		to 03/30/16		5,358.73	
Interest:	4.000%	Accrued num. of days:	329	Per Diem:	16.287935		
Monthly payment to escrow							
Hazard	\$0.00	Taxes	\$0.00	MIP	\$0.00		
A&H	\$0.00	Life	\$0.00	Escrow Advance	\$0.00		
Total montly escrow		\$0.00	Months in arrears	2	Escrow in arrears	0.00	
					Accrued Late Charge:	57.18	
Advances Under Loan Contract:							
Title Search	\$45.00	Tax Certificate	\$0.00	Inspection	\$0.00	909.52	
Other	\$864.52						
Legal Fees:						375.00	
Total Estimate due as of		03/30/16				155,327.84	
AMOUNT IN ARREARS							
PRE-PETITION AMOUNT:							
2	payments of	\$776.04	each one	1,552.08			
accumulated lated charges		57	57.18				
Advances Under Loan Contract:							
Title Search	\$45.00	Tax Certificate	\$0.00	Inspection	\$0.00	909.52	
Other	\$864.52						
Legal Fees:						375.00	
A = TOTAL PRE-PETITION AMOUNT						2,893.78	
POST-PETITION AMENDED:							
0	payments of	\$776.04	each one	0.00			
Late Charge		0	0.00				
Post Petition Legal Fees		0.00				0.00	
B = TOTAL POST-PETITION AMOUNT						0.00	
POST-PETITION AMOUNT:							
8	payments of	\$776.04	each one	6,208.32			
Late Charge		\$184.38	184.38				
Post Petition Legal Fees		\$575.00	575.00				
C = TOTAL POST-PETITION AMOUNT						6,967.70	
TOTAL AMOUNT IN ARREARS						9,861.48	
OTHER INFORMATION							
Next pymt due	06/01/15	Interest rate	4.000%	P & I	\$714.75	Monthly late charge	\$30.73
Investor	Banco Popular de Puerto Rico		Property address 787 RD KM 3.4 BAYAMON CIDRA PR 00739				
<p>The subscribing representative of Banco Popular de Puerto Rico declares under penalty of perjury that according to the information gathered by Banco Popular de Puerto Rico the foregoing is true and correct.</p> <p></p>							
BANCO POPULAR DE PUERTO RICO						DATE	

